

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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Kingsley Palmer,
Sharon Palmer,

Plaintiffs,

-against-

**Case No. 19-cv-5542
(RKK) (CLP)**

The City Of New York,
Inspector Elliot,
Colon,
Ramos,
Reggie aka Frank Singh,
E 40 Buyers IG, LLC,
Stephen Samuel Weintraub,
John Doe #1-2,

Defendants.
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DECLARATION

RACHEL AGHASSI, an attorney duly admitted to practice law in the State of New York, declares the following to be true, under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am a partner to the law firm Furman Kornfeld & Brennan LLP, attorneys for Defendant Stephen Samuel Weintraub (“Attorney Weintraub”) in the above-captioned matter. As such, I am fully familiar with the facts and circumstances set forth herein based upon the contents of the file maintained by my office.

2. This Declaration is respectfully submitted in support of Attorney Weintraub’s Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) based on the grounds that Plaintiffs’ complaint fails to state a valid cause of action upon which relief may be granted.

3. Annexed hereto as Exhibit A is a true and complete copy of Plaintiffs’ Verified Complaint dated October 1, 2019.

4. Annexed hereto as Exhibit B is a true and complete copy of the Judgment of Possession Order of the Civil Court of the City of New York, Kings County dated February 28, 2019.

5. Annexed hereto as Exhibit C is a true and complete copy of the Order to Show Cause of the Kings County Supreme Court dated May 20, 2019.

6. I affirm under the penalties of perjury that the foregoing is true and correct.

Dated: New York, New York
May 26, 2020

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

By: /s/ Rachel Aghassi
Rachel Aghassi, Esq.
Attorney for Defendants
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